

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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Attorney for Debtor

In Re:

Tien Le

debtor

Case No.: 18-27256

Judge: ABA

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

CREDITOR'S MOTION or CERTIFICATION OF DEFAULT
 TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned Chapter 13 proceeding hereby objects to the following (**choose one**):

1. Motion for Relief from the Automatic Stay filed by

Quicken Loans, Inc., creditor.

A hearing has been scheduled for October 1, 2019 at 10:00am

OR

Motion to Dismiss filed by the Standing Chapter 13 Trustee, _____.

A hearing has been scheduled for _____, at _____.

Certification of Default filed by _____, creditor

I am requesting a hearing be scheduled in this matter.

OR

Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support of attached hereto.

Payments have not been made for the following reasons and debtor proposes repayment as follows **explain your answer**): _____

Other (**explain your answer**): In my Chapter 13 case, my mortgage company has filed a motion for relief from the stay saying that I owe them \$1,059.94 for property taxes for the third quarter of 2019 that were not paid. The mortgage company also indicated that this was a non-escrow account, but they have made it an escrow account now because the property taxes weren't paid. My monthly payment used to be a little over \$700 and now it is going to be \$1,300 because it includes the taxes and insurance for my property. I do not understand why they are filing a motion for relief from the stay asking for money for one quarter's worth of property taxes when they have increased my payment to have this money paid. Accordingly, I ask that this motion be denied.

3. This Certification is being made in an effort to resolve the issues raised by the creditor in this motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 09/24/2019

/s/ Tien Le
Tien Le, debtor

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

If this form is not filed the Motion or Certification of Default will be deemed uncontested